

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

-v-

GUSTAV KLOSZEWSKI,

Defendant.
-----X

16-CR-200

NOTICE OF MOTION

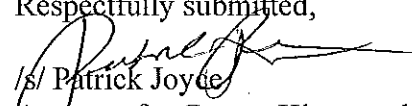
PLEASE TAKE NOTICE, that upon the affirmation of defendant's attorney Patrick Joyce, annexed hereto, the defendant will move this Court before the Honorable Alvin Hellerstein, United States District Judge, in the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York 10007, at a time convenient for the Court, for issuance of the following Orders:

1. For an order granting an audibility hearing to determine the admissibility of a tape recording of a meeting held on February 26, 2016;
2. For an order granting defendant's request for a bill of particulars;
3. For an order granting defendant's request for discovery;
7. For such other and further relief as the Court may deem just and proper.

Dated: May 20, 2016
New York, New York

Respectfully submitted,

BY:


/s/ Patrick Joyce
Attorney for Gustav Kloszewski
70 Lafayette Street – 2nd Floor
New York, New York 10013
Tel. (212) 285-2299

TO: Honorable Alvin Hellerstein
United States District Court
Southern District of New York

500 Pearl Street
New York, New York 10007

AUSA Gina Castellano
One Saint Andrew's Plaza
New York, New York 10013